

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA
ex rel. JOSÉ R. VALDEZ,

Plaintiff,

v.

AVETA, INC. et al.,

Defendants.

Case No. 3:15-cv-01140-CCC

**JOINT INFORMATIVE MOTION REGARDING STATUS OF SETTLEMENT AND
CONTINUED NEED FOR STAY PURSUANT TO THE COURT'S
MAY 11, 2020 ORDER (DKT. NO. 505)**

The parties very respectfully file this joint informative motion in response to the Court's May 11, 2020 Order (Dkt. No. 505) to update the Court regarding the status of the parties' settlement and the continued need for a stay of all deadlines in this case.

The parties remain committed to the settlement-in-principle and are still in the process of finalizing a definitive settlement agreement based on the settlement term sheet signed by the parties. As a result of the COVID-19 pandemic, the parties have experienced unforeseen delays but are in the process of completing a definitive settlement agreement.

In view of the foregoing, the parties request that the Court continue the stay of all deadlines in this litigation and order the parties to file a further informative motion on or before **July 9, 2020** apprising the Court of the settlement status and any further need for a stay, unless the parties have, on or prior to that date, already filed a stipulated motion to dismiss this action, in which case no such joint informative motion need be filed.

The parties respectfully request that the Court grant this motion.

Respectfully submitted,

/s/ Daniel Salinas-Serrano

Thomas H. Bienert, Jr. (admitted *pro hac vice*)
Michael R. Williams (admitted *pro hac vice*)
Whitney Z. Bernstein (admitted *pro hac vice*)
BIENERT KATZMAN, PC
903 Calle Amanecer, Suite 350
San Clemente, California 92673

Valerie Roddy (admitted *pro hac vice*)
Justin Griffin (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017

Daniel Salinas-Serrano (USDC-PR No. 224006)
Benjamin A. O'Neil (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
1300 I Street, N.W., Suite 900
Washington, D.C. 20005

*Attorneys for Plaintiff-Relator Elizabeth Valdez
and Counterclaim Defendant José R. Valdez*

/s/ Ankur J. Goel

Arturo J. García-Solá (USDC-PR No. 201903)
Leslie Y. Flores-Rodríguez (USDC-PR No. 223601)
Reinaldo L. Figueroa-Matos (USDC-PR No. 229903)
McCONNELL VALDEZ LLC
270 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918
(787) 759-9292

Russell Hayman (admitted *pro hac vice*)
McDERMOTT WILL & EMERY LLP
2049 Century Park East, Suite 3200
Los Angeles, California 90067
(310) 277-4110

Ankur J. Goel (admitted *pro hac vice*)
Michael S. Nadel (admitted *pro hac vice*)
Lisa M. Richman (admitted *pro hac vice*)
Jennifer B. Routh (admitted *pro hac vice*)
McDERMOTT WILL & EMERY LLP
500 North Capitol Street, N.W.
Washington, D.C. 20001
(202) 756-8000

Attorneys for Defendants-Counterclaim Plaintiffs